

Issued by the  
**United States District Court**  
 NORTHERN DISTRICT OF ILLINOIS

**FILED**  
 3/29/2022  
 THOMAS G. BRUTON  
 CLERK, U.S. DISTRICT COURT  
 JK

**Malibu Media, LLC, ZO Digital, LLC,  
 and Colette Pelissier**

**Judgment Debtors,**

**CITATION TO DISCOVER ASSETS**

v.

CASE NUMBER: 18 C 6447

**William Mullins,**

**Judgment Creditor.**

TO: CC BILL, LLC, c/o Marcus Bohn, 2353 W University Dr., Tempe, Arizona 85281, Attn: Managing Member Ira R. Cadwell

On November 29, 2021, the court entered judgment for \$59,614.52 in favor of William Mullins and against **Malibu Media, LLC, ZO Digital, LLC, and Colette Pelissier**, jointly and severally, and it remains unsatisfied in the total amount of **\$17,635.04** plus interest and costs.

**YOU ARE PROHIBITED** from making or allowing any transfer or other disposition of, or interfering with, any property not exempt from execution or garnishment belonging to the judgment debtor or that to which he may be entitled, or which may be acquired by or become due to the judgment debtor and from paying over or otherwise disposing of any money not so exempt, which is due or becomes due to judgment debtor, until further order of court or termination of the proceedings. You are required to withhold the payment or transfer of any money or other property no more than twice the amount of the unsatisfied judgment.

**YOUR FAILURE TO APPEAR AND ANSWER MAY CAUSE YOU TO BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO A CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT.**

- ☒ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to be examined under oath to discover assets or income not exempt from the enforcement of the judgment.

PLACE OF TESTIMONY	COURTROOM	DATE AND TIME
219 S. Dearborn, Chicago, Illinois 60604	1441	April 18, 2022, 9:30 a.m.* *No personal appearance is required if respondent mails a written answer three days before this return date.

- ☐ YOU ARE COMMANDED to appear in the at the place, date, and time specified below to be examined under oath to discover assets or income not exempt from the enforcement of the judgment.

PLACE OF TESTIMONY	DATE AND TIME
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- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents at the place, date, and time specified above: See attached rider.

**CERTIFICATE OF ATTORNEY**

The undersigned certifies under penalties of perjury as provided by law that on November 29, 2021, judgment was entered against **Malibu Media, LLC, ZO Digital, LLC, and Colette Pelissier** for \$59,614.52 in the United States District Court for the Northern District of Illinois in case number 18 C 6447, and the balance now due is **\$17,635.04** plus interest and costs.

/s/ Joseph A. Stewart

Joseph A. Stewart, The Peacock Law Group, 161 N. Clark Street, Suite 1600, Chicago, Illinois 60601; (312) 741-1070; joseph.stewart@thepeacocklawgroup.com

**THOMAS G. BRUTON, Clerk of the District Court**

(By) Deputy Clerk

## PROOF OF SERVICE

DATE PLACE

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

## DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that I am over 21 years of age and the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

## Notice to judgment debtor pursuant to the Illinois Code of Civil Procedure § 2-1402(b)

## CITATION NOTICE

In the United States District Court  
for the Northern District of Illinois  
219 S. Dearborn St., Chicago, Illinois

**Malibu Media, LLC, ZO Digital, LLC,  
and Colette Pelissier, Judgment Debtors**

v.

**William Mullins, Judgment Creditor**

Amount of judgment: \$59,614.52 with a balance of **\$17,635.04**

This citation is directed to Wells Fargo Bank.

**NOTICE: The court has issued a citation against the party named above. The citation directs that person appear at the place designated above to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to you, the judgment debtor, or in which you, the judgment debtor, has an interest. The citation was issued on the basis of a judgment against you, the judgment debtor, in favor of the judgment creditor in the amount stated above. On or after the date stated above, the court may compel the application of any discovered income or assets toward payment on the judgment.**

The amount of income or assets that may be applied toward the judgment is limited by federal and Illinois law. The JUDGMENT DEBTOR (but not a corporate judgment debtor) HAS THE RIGHT TO ASSERT STATUTORY EXEMPTIONS AGAINST CERTAIN INCOME OR ASSETS OF THE JUDGMENT DEBTOR WHICH MAY NOT BE USED TO SATISFY THE JUDGMENT IN THE AMOUNT STATED ABOVE.

(1) Under Illinois or federal law, the exemptions of personal property owned by an individual debtor include the debtor's equity interest, not to exceed \$4,000 in value, in any personal property as chosen by the debtor; Social Security and SSI benefits, public assistance benefits; unemployment

compensation benefits, worker's compensation benefits; veteran's benefits, circuit breaker property tax relief benefits; the debtor's equity interest, not to exceed \$2,400 in value, in any one motor vehicle, and the debtor's equity interest, not to exceed \$1,500 in value, in any implements, professional books, or tools of the trade of the debtor.

(2) Under Illinois law, every person is entitled to an estate in homestead, when it is owed and occupied as a residence, to the extent its value of \$15,000, which homestead is exempt from judgment.

(3) Under Illinois law, the wages that may be applied toward a judgment is limited to the lesser of (i) 15% of gross weekly wages or (ii) the amount by which disposable earnings for a week exceed the total of 45 times the federal minimum hourly wage.

(4) Pension and retirement benefits and refunds may be claimed as exempt under Illinois law.

An individual judgment debtor (but not a corporate judgment debtor) may have other possible exemptions under the law.

THE JUDGMENT DEBTOR HAS THE RIGHT AT THE CITATION HEARING TO DECLARE EXEMPT CERTAIN INCOME OR ASSETS OR BOTH. The judgment debtor also has the right to seek a declaration at an earlier date, by notifying the clerk in writing at 219 S. Dearborn, 20<sup>th</sup> Floor, Chicago, Illinois 60604. When so notified, the Clerk of the Court will obtain a prompt hearing date from the court and will provide the necessary forms that must be prepared by the judgment debtor or the attorney for the judgment debtor and sent to the judgment creditor and the judgment creditor's attorney regarding the time and location of the hearing.

## Certificate of Mailing

I certify that within three business days of service on the above-named third party citation respondent a copy of this citation to discover assets and citation notice were sent by first class U.S. Mail to the judgment debtors last known address, which is 11802 Ellice Street, Malibu, California 90265

RIDER TO THE CITATION TO DISCOVER ASSETS  
SERVED ON CC BILL LLC IN  
MALIBU MEDIA, LLC V. WM. MULLINS, CASE NO. 18 C 6447

The judgment debtors are **Malibu Media, LLC, ZO Digital, LLC, and Colette Pelissier**. Produce all documents and things in your possession or control as they relate to the property, income, or assets of the judgment debtors, *individually or jointly*, for a one-year period preceding the return date listed on the Citation to Discover Assets including, but not limited to:

1. All records pertaining to open and closed merchant accounts of the judgment debtors, whether held jointly, as trustee or fiduciary, custodian, executor, or guardian, including accounts of any entity in which the judgment debtor may have a financial interest. Records should include all merchant accounts in which the judgment debtor has or has had signatory authority and/or the right of withdrawal and should include signature cards or other indicia of ownership for any account maintained by or for judgment debtors if the account is also owned by someone other than the judgment debtors.
2. Any other documents which may contain information concerning the property, income, or assets of the judgment debtors.